GSA

GSA Heartland Region
Safety and Environmental Management Team (6PEF-S)

13 Jan 2003

Ms. Christine O'Keefe
Missouri Department of Natural Resources
Land Protection Division's Hazardous Waste Program
P.O. Box 176
Jefferson City, MO 65102-0176

Re: Federal Center, 607 Hardesty Avenue, Kansas City, MO

Dear Ms. O'Keefe:

In your letter dtd 24 December 2002 you requested additional information concerning various issues and questions. Attached to this letter is our response to those issues and questions.

Please do not hesitate to contact me should you have any additional questions regarding this project. I can be reached at the above address or, by phone, at 816-823-2227.

Thank you,

Dave L. Hartshorn, CIH, CSP, CHMM
Industrial Hygienist

U.S. General Services Administration
1500 E. Bannister Road
Kansas City, MO 64131

RESPONSES TO QUESTIONS

pertaining to

Hardesty Federal Complex

607 Hardesty Avenue
Kansas City, Missouri

In a letter from MDNR's Voluntary Compliance Section dtd 24 Dec 2002, a number of issues were raised and questions posed regarding several environmental projects completed or underway by the General Services Administration (GSA) at the Hardesty Federal Center, 607 Hardesty Avenue, Kansas City, MO. The following are GSA's responses.

Issue #1:

Please be aware the Missouri Department of Natural Resources' Geological Survey and Resource Assessment Division (GSRAD) has identified a water well within a one-mile radius of the Federal Center site. It is used for domestic purposes and is located east of the site on 6900 Scarritt. The department has information this well has been tested for contaminants in association with another site. I will look into the history of why this well was tested.

Response:

USTs: This newly-identified well is approximately 6,150 feet from Hardesty Federal Center. As such, GSA does not believe the contamination from the LUSTs have affected the well. Furthermore, the sampling conducted on-site during the UST investigations has shown the groundwater contamination from the LUSTs has not moved off-site.

VOCs: Based on the distance of this well from the Hardesty Federal Center and the concentrations of the VOCs documented in the Site Inspection (SI) report dated November 4, 2002, it is not anticipated at this time that the domestic well identified at 6900 Scarritt would be affected by VOC contamination from the Hardesty Federal Center.

General: We would be interested in reviewing the results of the water sampling conducted for the well located at 6900 Scarritt. GSA would request that a copy of the sampling event and analyses be provided to us.

Issue #2:

I am still waiting for a response from Cape Environmental on my comments on the corrective action plan and addendum. The department needs to know if the adjacent landowner has been contacted regarding the contamination migrating onto his land. The department would like to know if the plume could be contained to the site.

Response:
Cape Environmental has provided GSA with their responses to your previous comments. GSA has been reviewing their responses. GSA has advised Cape to finalize their responses and forward them directly to MDNR; receipt of them should occur during January 2003.

Question #1:
The Phase I report stated the PCBs in the electrical transformers have been replaced by Capital Electric but the SI report makes no mention of this action. Please provide information as to the status of the PCB transformers.

Answer:
All transformers located at Hardesty are still in use and operational. No evidence of leakage from the transformers is known to exist. The transformers located in substation Building 13 at Hardesty have been labeled as "Non-PCB." The Preliminary Assessment (PA) report dated 4 November 2002, stated that one transformer in the electrical vault of Building 10 contained PCBs at a level between 50 to 500 parts per million (ppm), and that an additional transformer in Building 10 contained PCBs at 70 ppm. Since the likelihood of a release from the transformers was not identified at the site during the Phase I Environmental Site Assessment and PA, sampling or inclusion of the PCB status of the transformers was not made a part of the SI report dated 4 November 2002.

Question #2:
Were the underground storage tanks identified by a Magnometer survey? How were the underground storage tanks identified if no records identify their locations? Please be aware magnometers are not very effective in our clay soils.

Answer:
GSA has information of the possible or actual locations of underground storage tanks (USTs) which had been in-place at Hardesty Federal Complex. This information was in the form of site plans (previously forwarded to MDNR) and employee knowledge. Based upon this information, GSA contracted the services of an individual to determine if USTs were present which we could not otherwise confirm as present or not present. The magnetometer indicated the presence of underground utilities which we knew were present, and did not indicate the presence of USTs which we suspected or knew to have been present but subsequently removed. Because of this, we are confident of the results of the magnetometer survey.

Question #3:
When will air sampling be done in the firing range building? Please indicate how air is circulated in the basement. No information was included in the PA/SI on this issue.

Answer:
The firing range has been out of operation for at least 10 years and, at this time, the air handling systems within the building are shut off as the building is unoccupied. Sampling data from the SI report (dated 4 Nov 2002) shows there is lead present in the dust on the walls and floor surfaces of the firing range at levels above the MDNR CALM lead abatement levels. GSA has developed clean-up plans to address this contamination (previously provided MDNR). As a part of the clean-up plan, environmental sampling will be conducted to confirm completion.

Question #4:

Please provide soil boring logs and well logs for the sampling locations east of Building 6. The Site Inspection report references the local geology by referring to the Underground Storage Tanks reports at the subject site. However the completion report documents fill material brought into the site for the railroad tracks east of the building noting a marshy type soil requiring more material than first estimated.

Answer:
Boring logs for sampling probes advanced at the site during soil and groundwater sampling activities in February 2002 are included in Appendix B of the SI report dated 4 Nov 2002. The goal of the additional sampling activities in June, July, and October 2002 was to collect and analyze only groundwater samples since laboratory analytical results from February 2002 soil samples did not indicate the presence of RCRA Metals, VOCs, and/or SVOCs at levels above the MDNR Scenario B STARC CALM. Therefore, since no additional soil samples were to be collected, boring logs were not prepared for the sampling probes advanced east of Building 6 in June, July, and October 2002. These probes were advanced directly to groundwater without the collection of soil for lithology or analysis.

Since permanent groundwater monitoring wells were not installed at the site, well logs were not prepared. Well logs will be prepared upon installation of future permanent groundwater monitoring wells.

Question #5:

Since circuit board manufacturing occurred in Building 6 why was no testing for other metals besides RCRA metals in Bldg. 6 grassy area. Please explain the rationale for not testing.

Answer:
Discussion with the Federal Aviation Administration's manager of their Hardesty operation (Mr. Dan Washburn) indicated their circuit board etching operation was extremely small-scale: only up to about a half-dozen boards were etched at any one time. Waste etching chemicals were collected in barrels and disposed. When the operation was terminated (approx. 15 years ago), FAA contracted with a firm to remove and dispose of waste etch chemicals, the remainder of FAA's unused stock of etch chemicals, and the equipment used in the process. This firm also cleaned the room to remove residual contamination, if any. Manifests of this disposal action

were filed with MDNR at the time. VOC contamination of the grassy area between Bldg. 6 and 9 is most likely a result of a leaking storage tank system (piping and/or tanks) not associated with the circuit board etching operation. The etching operation was contained within Bldg. 6. Furthermore, per Mr. Washburn, copper was the only metal involved in the process. Copper is not regulated under RCRA; under CERCLA the reportable quantity for copper is 5,000 pounds. GSA has no reason to suspect environmental contamination of the soil or groundwater would have occurred from this etching process.

Question #6:

Why were PAHs not sampled in the area of Bldg. 3 &3A?

Answer:
The previous usage of the USTs associated with Bldg. 3/3A is well known – they were used to supply #2 fuel oil to the boilers located within these buildings. Diesel fuel and #2 fuel oil have the same composition (see attached Technical Update from Phase Separation Science, Inc.).

Referring to the MDNR Underground Storage Tank Closure Guidance Document (dtd March 1996), the required analytical tests for closures involving gasoline and #2 diesel fuel are: Total Petroleum Hydrocarbons (TPH) – gasoline through #4 fuel oil fractions (GRO, DRO); Benzene, Toluene, Ethyl benzene, Xylenes (BTEX); and Methyl Tertiary Butyl Ether (MTBE) using EPA Method 8015 (OA1/OA2).

PAHs are not required to be sampled in this instance and we have no reason to suspect their presence associated with the LUSTs at this facility.

Question #7:

Are there any boring logs for the expanded SI report?

Answer:
See response under Question #4.

Question #8:

Now that groundwater contamination has been identified will permanent monitoring wells be installed?

Answer:
GSA has 3 projects for the Hardesty Federal Complex which have identified groundwater and/or subsurface soil contamination. GSA previously provided to MDNR remedial action reports on 2 of these projects (i.e., Remedial Action Plan for the non-regulated USTs and Corrective Action Plan for the regulated USTs); these reports identify permanent monitoring wells as part of our planned remedial action. For the 3rd project (the Preliminary Assessment/Site Investigation), we

have not yet moved to identifying a corrective action for the VOCs (primarily TCE) found in the groundwater; however, we suspect at this time that permanent monitoring wells will most likely be included.

Question #9:

What is the volume and extent of the groundwater plume? Since it goes offsite will further characterization be performed in city right of way or across Independence? How far inside the property line were monitoring wells 10,11 and 12 installed?

Answer:
USTs: As outlined within the Corrective Action Plan and the Remedial Action Plan, groundwater contamination from the LUSTs (associated with Buildings #3/3A and #4) has not migrated off-site, as indicated by down gradient groundwater sampling.

VOCs: The scope of the expanded SI activities was to assess the horizontal extent to within the boundaries of the site. The next phase of investigation regarding TCE in groundwater and development of a remediation plan will attempt to further determine a more complete picture of the nature and extent, as well as outlining off-site characterization efforts. Sampling probes #10, #11, #12, and #16, installed by Terracon, were installed as follows:

MW #	Location*
10	N.E. corner of Bldg. 6, approx 25 feet south of property line.
11	231 feet east of Bldg. 6, approx 25 feet south of property line.
12	586 feet east of Bldg. 6, approx 41 feet south of property line.
16	392 feet east of Bldg. 6, approx 25 feet south of property line.
**Based on track-Geoprobe-accessible site conditions.*	

Question #10:

Further testing may be warranted since other contaminants were not sampled during the SI at the site: PCBs, PAHs, metals, SVOCs in the UST petroleum plume. Please explain if additional testing for other contaminants is going to be performed. In CERCLA petroleum is excluded but the petroleum may interfere with the proposed remediation or the technique may not be effective if other contaminants interfere.

Answer:
General: Contaminant interference will be addressed, as necessary, during remedial planning.

USTs: See response to Question #6.

VOCs: See response to Question #1 regarding sampling for PCBs. During the initiation of SI sampling activities in the vicinity of Building 6, VOCs, SVOCs, and RCRA Metals were

sampled until their extent was determined and additional sampling was no longer relevant. See response to Question #5 regarding metals sampling.

Question #11:

Lead was identified in the fly ash in Bldg. 3 (1999). Please give an explanation of why lead would be in this ash since coal, natural gas and fuel oil do not normally contain lead. Could something other than these materials have been burned?

Answer:
During an environmental investigation conducted in 1999, lead was identified in a sample of fly ash. However, subsequent retesting of the fly ash, as documented in the SI report dated 4 Nov 2002, did not detect lead in the fly ash at concentrations exceeding TCLP regulatory levels. Based upon this retesting, GSA has determined that further investigation of lead in the fly ash is not warranted.

Question #12:

Please explain why the Phase I report says asbestos abatement was done in the buildings but the Preliminary Assessment indicates abatement was not done.

Answer:
As stated in the Phase I report, dated 19 Aug 1999, according to interviews with an on-site maintenance technician, asbestos-containing materials (ACM) had been *removed* from several of the Hardesty buildings. The PA report dated 4 Nov 2002 included a review of a previous Asbestos Inventory Report for the Federal Center. The PA report does not indicate that asbestos abatement was not conducted at the site. The PA report states that indications of releases of ACM listed in the Asbestos Inventory Report were not observed during the PA site visit, and that an asbestos inspection or verification of the listed ACM was not conducted. However, as regarding asbestos abatement at this facility, GSA has not undertaken a project to remove ACM *en masse*. GSA has, however, engaged in O&M efforts throughout the years as determined necessary (e.g., repair or replacement of pipe wrap, boiler insulation, etc.).

Question #13:

Please indicate if GSA is going to provide a schedule for the state to review.

Answer:
Once the PA/SI is approved by the regulators, GSA will schedule planning for the required work.

Question #14:

Will GSA provide copies of all reports to prospective purchasers so they will know there is a probable off-site groundwater plume? Please be aware Megaspace requested a copy of the PA, SI, expanded SI from the department. However no copy of the PA/SI references was requested.

Answer:
GSA considers itself a good steward and an honest real estate broker. In previous sales of real estate, GSA has taken pains to ensure that prospective purchasers are aware of all environmental issues affecting the GSA properties in which they were interested. Accordingly, continuing this policy, GSA will provide prospective purchasers all environmental reports pertinent to this site. The exact manner and means in which this will occur has not yet been determined.

Question #15:

Since many railroad spurs enter the site why weren't samples collected in these areas?

Answer:
Samples were collected where GSA and our contractors had evidence indicating that environmental contamination would be suspected. We have no evidence pointing to leakage or spillage associated with the railroad spurs.